

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 4: The Strategy for Paddock
Wood**

**Issue 5: Viability and Infrastructure
Provision**

Document Reference: TWLP/138



Contents

Matter 4 – The Strategy for Paddock Wood	3
Issue 5 – Viability and Infrastructure Provision.....	3
Inspector’s Question 1: [re. Has the Infrastructure Delivery Plan been updated?].....	3
TWBC response to Question 1	3
Conclusion	5
Inspector’s Question 2: [re. Is the plan viable?]	6
TWBC response to Question 2.....	6
Conclusion	7

Matter 4 – The Strategy for Paddock Wood

Issue 5 – Viability and Infrastructure Provision

Inspector’s Question 1: [re. Has the Infrastructure Delivery Plan been updated?]

Has the Infrastructure Delivery Plan (‘IDP’) been updated to reflect the suggested changes to the Plan?

TWBC response to Question 1

Introduction

1. The Submission Local Plan [[CD 3.128](#)] (SLP) was submitted following extensive development to seek to deliver significant levels of housing including through delivery of Strategic Site delivery to meet the Objectively Assessed Need for housing. Appropriate levels of infrastructure have been identified through the SLP preparation and have been included in the Infrastructure Delivery Plan [[CD 3.142](#)] (IDP).
2. The IDP is comprehensive and includes all associated infrastructure related to the strategic sites delivery at Paddock Wood and land at east Capel (STR/SS 1) (PWeC) and Tudeley Village (STR/SS 3).
3. The Initial Findings [[ID 012](#)] sets out that ‘Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also, uniquely for Tunbridge Wells borough surrounded by some land which is outside the Green Belt and AONB. It is therefore an agreed position in the Initial Findings that Paddock Wood represents a ‘logical choice for growth’, but that the strategy for the town needs revisiting, and that land allocated for housing in Flood Zone 1 is not justified (paragraph 52). Consequential impacts of the Council’s decision on Tudeley Village (STR/SS 3) are also identified as having implications.

Consideration

4. The Development Strategy Topic Paper Addendum [[PS_054](#)] (DSTPA) sets out the council's approach to responding to the Initial Findings which includes the removal of the strategic delivery allocation at Tudeley Village and a reduction of housing at PWeC. The Strategic Sites Master Planning and Infrastructure Study Follow on Study [[PS_046](#)] (FOS) sets out that the implications from the potential removal of the Tudeley Village allocation, in addition to the reduced level of developable land within Flood Zone 1 at PWeC. As a result there is a need to deliver appropriate levels of secondary school education provision and associated sport and leisure facilities in addition to other infrastructure as part of the PWeC site. Further supporting modelling work has also been undertaken to review the impacts on the highway network from a PWeC only scenario.
5. Consequently the level of associated infrastructure has changed somewhat from that previously assumed with the SLP which relied upon certain interdependencies between Tudeley Village and PWeC such as for secondary school education, sports and leisure, and highways infrastructure.
6. The revised position on infrastructure has been that the PWeC allocation is capable of being delivered sustainably in a viable manner. This revised position as set out in the FOS has been checked by undertaking an Addendum to the Local Plan Viability Assessment Main report [[PS_061a](#)] which has reviewed the high-level assumptions on the infrastructure package necessary to mitigate the development at PWeC.
7. The IDP that was submitted with the SLP was revised over time and it is acknowledged that it was informed through discussion and consultation with relevant service providers operating in the borough, alongside reviewing existing evidence and publications (such as management plans and strategies). The IDP was published as a "Live Document", updated to reflect relevant changes in information and further changes may be required as a result of further updates and information from service providers and progress with the production of the Local Plan.

Conclusion

8. A significant amount of additional work has been undertaken to resolve the matters raised in the Initial Findings, which has meant considerable review of the deliverability of the strategic development at Paddock Wood and land at east Capel. In turn this has resulted in a review of the financial viability of the scheme as a standalone development and the specific infrastructure requirements.
9. Whilst the Infrastructure Delivery Plan has not at this stage been updated a comprehensive review of the viability position has been undertaken to ensure the overall deliverability of the STR/SS 1 allocation. It is fully intended that the Infrastructure Delivery Plan will be updated to reflect the proposed changes as part of the Main Modification process.

Inspector's Question 2: [re. Is the plan viable?]

What evidence is there to demonstrate that the necessary infrastructure requirements can be delivered over the plan period? Is the Plan viable?

TWBC response to Question 2

Introduction

10. The Councils approach in responding to the Initial Findings has been set out in previous Stage 3 Hearing Statements, and has in summary resulted in a comprehensive review of the development strategy as set out in the Development Strategy Topic Paper Addendum [[PS_054](#)] (DSTPA).
11. DSTPA sets out what the proposed changes to the plan are and the key infrastructure requirements are outlined in the Strategic Sites Master Planning and Infrastructure Study Follow on Study [[PS_046](#)] (FOS) to ensure the development can come forward with the necessary infrastructure to meet the local requirements.

Consideration

12. The Council's consultants Dixon Searle Partnership (DSP) has undertaken a comprehensive review of the associated infrastructure cost assumptions in the FOS relating to the revised development at Paddock Wood and land at east Capel (STR/SS 1) (PWeC).
13. The majority of assumptions remain as per Stage 2 financial viability assessment (VA) including the Submission Local Plan development management policies (those policies that influence viability through additional cost to development). Therefore, it has not been necessary to update the assumptions wholesale as most remain appropriate to continue with for the purpose of the strategic assessment.
14. Although a few changed infrastructure items are included within the revised schedule, and the figures have all been updated, broadly the list of requirements remains as previous in terms of the type and nature of works and contributions needed to support such a scheme, other than highway infrastructure improvements which have reduced. Given the passage of time since the initial infrastructure viability assessment supporting the SLP was undertaken in 2021, a +15% uplift in costs has been applied to account for

rising construction costs, and an equal increase has been applied by DSP in terms of build costs as part of the revised assessment.

15. The viability assessment has also reflected the +16.2% change in the Office for National Statistics (ONS) House Price Index (HPI) data with Tunbridge Wells selected over the period January 2021 – October 2023.
16. Some adjustments have been made to reflecting the lower scale of development that is identified at PWeC as a result of the Council's position to have housing only in Flood Zone 1. Nevertheless, in the main the infrastructure costs allowances have remained in proportion with the previous schedule of infrastructure required for the SLP. The broad cost estimate per dwelling remains very similar to the previous allowances so that the adjustment for inflation and scale of development is the main difference.
17. The Viability Assessment Addendum has also included explicit cost assumptions reflecting allowances for biodiversity net gain (BNG) and electric vehicle charging points (EVCPs) provision, being as they are national and building regulations requirements respectively. TWBC emerging policy in relation to the provision of accessible new homes i.e. to building regulations Part M4(2) and M4(3) through have also been included.

Conclusion

18. The Council has amended the strategic delivery of housing as set out in the Development Strategy Topic Paper Addendum to resolve the matters that have been raised in the Initial Findings. The assessment of the revised position on housing delivery has been comprehensive and thorough, and has included a review of the financial viability of the STR/SS 1 allocation over the plan period to ensure the plan is still viable.